

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

OLLIE GREENE, et al,

§

Plaintiffs,

§

v.

§ **CAUSE NUMBER: 3:11-cv-0207-N**

**TOYOTA MOTOR CORPORATION,
et al.**

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§
§

Defendants.

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§

JURY TRIAL DEMANDED

PLAINTIFFS' REPORT ON TRIAL EXHIBIT PHOTOS

Plaintiffs Ollie Greene, Individually and as the surviving parent of Wyndell Greene, Sr., William Greene, as the Administrator of the Estate of Wyndell Greene, Sr. and Marilyn Burdette Hardeman, Individually and as the surviving parent of LaKeysha Greene (collectively hereinafter referred to as "Plaintiffs") submit this pleading in compliance with the Court's June 18, 2014, Order (Dkt. No. 829) and show as follows:

Plaintiffs' Proposed Exhibit	(1) Relevancy of Exhibit	(2) Supports Expert Test.	(3) How relevancy affected if redacted?
Plaintiffs' Ex. 310 – photo of Wyndell Greene at burn unit	Establishes pain and suffering, and physical disfigurement. Also, supports necessity and reasonableness of medical expenses	Yes	Relevance would be substantially affected if exhibit is redacted to conceal the nature of the pain and physical disfigurement
Plaintiffs' Ex. 311 – photo of Wyndell Greene at burn unit	Establishes pain and suffering, and physical disfigurement. Also, supports necessity and reasonableness of medical expenses	Yes	Relevance would be substantially affected if exhibit is redacted to conceal the nature of the pain and physical disfigurement
Plaintiffs' Ex. 312 – photo of Wyndell Greene at burn unit	Establishes pain and suffering, and physical disfigurement. Also, supports necessity and reasonableness of medical expenses	Yes	Relevance would be substantially affected if exhibit is redacted to conceal the nature of the pain and physical disfigurement

Plaintiffs' Proposed Exhibit	(1) Relevancy of Exhibit	(2) Supports Expert Test.	(3) How relevancy affected if redacted?
Plaintiffs' Ex. 313 – photo of Wyndell Greene at burn unit	Establishes pain and suffering, and physical disfigurement. Also, supports necessity and reasonableness of medical expenses	Yes	Relevance would be substantially affected if exhibit is redacted to conceal the nature of the pain and physical disfigurement
Plaintiffs' Ex. 314 – photo of Wyndell Greene at burn unit	Establishes pain and suffering, and physical disfigurement. Also, supports necessity and reasonableness of medical expenses	Yes	Relevance would be substantially affected if exhibit is redacted to conceal the nature of the pain and physical disfigurement
Plaintiffs' Ex. 315 – photo of Wyndell Greene at burn unit	Establishes pain and suffering, and physical disfigurement. Also, supports necessity and reasonableness of medical expenses	Yes	Relevance would be substantially affected if exhibit is redacted to conceal the nature of the pain and physical disfigurement
Plaintiffs' Ex. 316 – photo of Wyndell Greene at burn unit	Establishes pain and suffering, and physical disfigurement. Also, supports necessity and reasonableness of medical expenses	Yes	Relevance would be substantially affected if exhibit is redacted to conceal the nature of the pain and physical disfigurement
Plaintiffs' Ex. 317 – photo of Wyndell Greene at burn unit	Establishes pain and suffering, and physical disfigurement. Also, supports necessity and reasonableness of medical expenses	Yes	Relevance would be substantially affected if exhibit is redacted to conceal the nature of the pain and physical disfigurement
Plaintiffs' Ex. 318 – photo of Wyndell Greene at burn unit	Establishes pain and suffering, and physical disfigurement. Also, supports necessity and reasonableness of medical expenses	Yes	Relevance would be substantially affected if exhibit is redacted to conceal the nature of the pain and physical disfigurement
Plaintiffs' Ex. 258 – photo of Wyndell Greene at Medical Examiner's office	Establishes permanent physical disfigurement and cause of death	Yes	Relevance would be substantially affected if exhibit is redacted to conceal the nature of the cause of death and permanent physical disfigurement

Plaintiffs' Proposed Exhibit	(1) Relevancy of Exhibit	(2) Supports Expert Test.	(3) How relevancy affected if redacted?
Plaintiffs' Ex. 1 – photo of Lakeysha Greene on roadway	Establishes pain and suffering, and burns	Yes	Relevant to showing that Toyota's fire burned Mrs. Greene, the occupant restraint failure and the underride guard failure. Would be substantially affected if exhibit is redacted to conceal the nature of Mrs. Greene's injuries and burns
Plaintiffs' Ex. 4 – photo of child being removed from 4Runner	Establishes pain and suffering, and burns	Yes	Relevant to showing that Toyota's fire burned the kids and the effect of the underride guard failure. Would be substantially affected if exhibit is redacted to conceal the nature of the kids' injuries and burns
Plaintiffs' Ex. 5 – photo of child being removed from 4Runner	Establishes pain and suffering, and burns	Yes	Relevant to showing that Toyota's fire burned the kids and the effect of the underride guard failure. Would be substantially affected if exhibit is redacted to conceal the nature of the kids' injuries and burns
Plaintiffs' Ex. 7 – photo of child being removed from 4Runner	Establishes pain and suffering, and burns	Yes	Relevant to showing that Toyota's fire burned the kids and the effect of the underride guard failure. Would be substantially affected if exhibit is redacted to conceal the nature of the kids' injuries and burns
Plaintiffs' Ex. 6 – photo of wreckage on freeway	Establishes pain and suffering, and burns	Yes	Would be unable to show extent of the causation element of the defective products

Respectfully Submitted,

/s/ Aubrey "Nick" Pittman
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CERTIFICATE OF SERVICE

I hereby certify that on June 19, 2014, the foregoing pleading was filed with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to all attorneys of record who have consented in writing to accept this Notice as service of documents by electronic means.

/s/ Aubrey “Nick” Pittman
AUBREY “NICK” PITTMAN